

Exhibit 16

1 THE JIMMERSON LAW FIRM, P.C.
JAMES M. JIMMERSON, ESQ.

2 Nevada State Bar No. 12599
jmj@jimmersonlawfirm.com

3 415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101

4 Telephone: 702-388-7171
Facsimile: 702-367-1167

5 KATTEN MUCHIN ROSENMAN LLP

6 Jeffrey A. Wakolbinger (*pro hac vice* to be submitted)

jeff.wakolbinger@katten.com

7 525 W. Monroe St.

Chicago, IL 60661

8 Telephone: 312.902-5200

9 *Attorneys for Plaintiff*
Jump Operations, LLC

10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 JUMP OPERATIONS, LLC,

14 Plaintiff,

15 v.

16 RICHARD WRIGHT MERRYMAN,

17 Defendant.

Case No.: 2:22-cv-00575-GMN-DJA

**DECLARATION OF JAMES M.
JIMMERSON, ESQ. IN SUPPORT OF
EMERGENCY MOTION FOR
TEMPORARY RESTRAINING
ORDER WITHOUT NOTICE IN
ANTICIPATION OF FUTURE
REQUEST FOR PRELIMINARY
INJUNCTION**

18
19 I, James M. Jimmerson, Esq., hereby declare as follows:

20
21 1. I am an attorney with The Jimmerson Law Firm, P.C., counsel for Plaintiff
22 Jump Operations, LLC (“Plaintiff”). I am over 18 years of age, and I have personal
23 knowledge of the facts set forth below.

24 2. This declaration is made in support of Plaintiff’s Emergency Motion for
25 Temporary Restraining Order Without Notice in Anticipation of Future Request for
26 Preliminary Injunction (the “Motion”).

27 3. The nature of the emergency currently experience by Plaintiff is the
28 ongoing threat of Defendant’s sale, transfer, and/or encumbrance of the domain name

THE JIMMERSON LAW FIRM, P.C.
415 South Sixth Street, Suite 100, Las Vegas, Nevada 89101
(702) 388-7171 - fax (702) 387-1167

www.wormhole.com (the “Wormhole Domain”). *See* Declaration of Jonathan Marcus at ¶ 10; Declaration of Jeffrey A. Wakolbinger, Esq. at ¶ 10.

4. Plaintiff attempted to resolve this problem without legal action but these efforts were unsuccessful. *See id.*

5. Plaintiff’s attorney’s contact information is as follows:

THE JIMMERSON LAW FIRM, P.C.
JAMES M. JIMMERSON, ESQ.
Nevada State Bar No. 12599
jmj@jimmersonlawfirm.com
415 South Sixth Street, Suite 100
Las Vegas, Nevada 89101
Telephone: 702-388-7171
Facsimile: 702-367-1167

KATTEN MUCHIN ROSENMAN LLP
Jeffrey A. Wakolbinger (*pro hac vice* to be submitted)
jeff.wakolbinger@katten.com
525 W. Monroe St.
Chicago, IL 60661
Telephone: 312.902-5200

6. Defendant does not have an attorney that has appeared in this action. Defendant’s contact information is as follows:

Richard Wright Merryman
4800 Westmont Ave.
Pahrump, NV 89061
dicko@wormhole.com
Telephone: unknown

7. Due to the fear that Mr. Merryman will attempt to defeat any future order for specific performance before a temporary restraining order could be issued, Plaintiff has not contacted Mr. Merryman since the Complaint was filed in this action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed April 7, 2022, in Las Vegas, Nevada.

/s/ James M. Jimmerson, Esq.
JAMES M. JIMMERSON, ESQ.